

**U.S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

|                 |                                 |
|-----------------|---------------------------------|
| <b>SWEIGERT</b> | <b>CIVIL CASE #:</b>            |
| <b>V.</b>       | <b>1:18-CV-08653-VEC</b>        |
| <b>GOODMAN</b>  | <b>JUDGE VALERIE E. CAPRONI</b> |

**PLAINTIFF'S THIRD NOTICE OF MOTION (WITH MEMORANDUM OF LAW IN  
SUPPORT OF MOTION) FOR JUDICIAL NOTICE OF DOCUMENTS AND FACTS**

Pursuant to Federal Rule of Evidence 201, and in connection with Plaintiffs' Motion for Preliminary Injunctive Relief and discovery, Plaintiff respectfully requests that the Court take judicial notice of the following federal lawsuits that involve the Defendant as a party:

Civil Action No. 3:17-cv-00601, U.S.D.C. for E.D.Va., ROBERT DAVID STEELE & EARTH INTELLIGENCE NETWORK vs. JASON GOODMAN

- DECLARATION OF JACQUELYN WEAVER, dated March 13, 2019, ECF no. 79

A Certificate of Service appears on the LAST page of this pleading.

Signed this sixth day of April (4/6), 2021.

Respectfully,



D. Geo. Sweigert

***D. GEORGE SWEIGERT***

***GENERAL DELIVERY***

***NEVADA CITY, CA 95959-9998***

***SPOILIATION-NOTICE@MAILBOX.ORG***

## **MEMORANDUM OF LAW**

### **I. THE COURT MAY TAKE JUDICIAL NOTICE OF FACTS THAT ARE NOT SUBJECT TO REASONABLE DISPUTE WHERE THEIR ACCURACY CAN BE DETERMINED BY RELIABLE SOURCES**

Pursuant to Rule 201(b)(2) of the Federal Rules of Evidence, courts may take judicial notice of facts that are not subject to reasonable dispute and are capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. Where a Court is supplied with the necessary information, taking judicial notice is mandatory. See Fed. R. Evid. 201(d).

### **II. COURT RECORDS ARE SUBJECT TO JUDICIAL NOTICE**

Pleadings and court filings are just the kind of documents that are not subject to reasonable dispute and are capable of accurate and ready determination under Rule 201(b)(2) of the Federal Rules of Evidence. Accordingly, it is proper for courts to take judicial notice of the existence of such documents. See *Roe v. Johnson*, 334 F. Supp. 2d 415, 419-20 (S.D.N.Y. 2004) (recognizing that a court, pursuant to Rule 201(b), may take notice of the public record, including complaints and court opinions); see also *A.I. Trade Finance, Inc. v. Centro Internationale Handelsbank AG*, 926 F. Supp. 378, 387 (S.D.N.Y. 1996) (in taking judicial notice of a judgment in Vienna, Austria, the court pointed out that “[t]he Second Circuit has noted that Rule 201 permits a court to take judicial notice of a foreign judgment”).

### **III. CONCLUSION**

For the reasons set forth above, the Plaintiff respectfully requests that the Court grant, in its entirety, the Plaintiff’s Motion for Judicial Notice of Documents and Facts.

A Certificate of Service appears on the LAST page of this pleading.

Signed this sixth day of April (4/6), 2021.

Respectfully,

A handwritten signature in black ink, appearing to read 'D. Sweigert', with a stylized flourish at the end.

D. Geo. Sweigert

***D. GEORGE SWEIGERT***  
***GENERAL DELIVERY***  
***NEVADA CITY, CA 95959-9998***  
***SPOILIATION-NOTICE@MAILBOX.ORG***

**CERTIFICATE OF SERVICE**

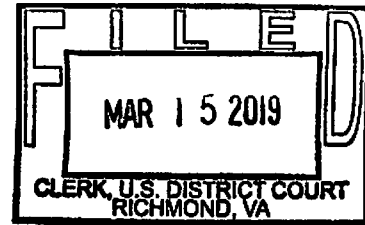
The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the sixth day of April (4/6) two thousand and twenty-one (2021).

|   |   |
|---|---|
| <b>Clerk of the Court, Room 200<br/>U.S. District Court 500 Pearl Street<br/>New York, New York 10007-1312<br/>EMAIL:<br/>temporary_pro_se_filing@nysd.uscourts.gov</b> | <b>Jason Goodman, CEO<br/>Multimedia System Design, Inc.<br/>252 7<sup>th</sup> Avenue, Apart. #6S<br/>New York, NY 10001<br/>truth@crowdsourcethetruth.org</b> |
|---|---|



***D. GEORGE SWEIGERT  
Pro Se Non-Attorney  
GENERAL DELIVERY  
NEVADA CITY, CA 95959***

## **ATTACHMENT A**



Jacquelyn Weaver  
102 Fern  
Purvis, MS 39475  
Jacquelyn113@ Hotmail.com

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ROBERT DAVID STEELE, ET. AL.

Plaintiff,

vs.

JASON GOODMAN, ET. AL.

Defendant

Case No.: 3:17-cv-601-MHL

DECLARATION OF JACQUELYN WEAVER

DECLARATION OF JACQUELYN WEAVER

Now comes Jacquelyn Weaver to inform this Court of the false allegations made against Jacquelyn Weaver by defendant Jason Goodman in Document 78, DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE, filed March/08/2019. I hereby attest that the following statements are made under the penalty of perjury.

Jason Goodman has stated in Document 78, page 3, lines 3-11 (I. Factual Background), "This legal action is a product of a conspiracy between Plaintiff, Intervenor Applicant and numerous third party co-conspirators. Among these parties are Intervenor Applicant's brother George Webb Sweigert (Webb), Manual Chavez III aka Defango (Chavez), Frank Bacon, believed to be Tyroan Simpson (Simpson), Nathan Stolpman (Stolpman), co-Defendant Susan Lutzke aka Susan Holmes aka Queen Tut (Lutzke), Steve Outtrim (Outtrim), Dean Fougere aka Titus Frost (Fougere), Kevin Allen Marsden (Marsden), Mari Rapp aka Sugar

DECLARATION OF JACQUELYN WEAVER - 1

1 Shine (Rapp), Jacquelyn Weaver (Weaver) and other unknown parties operating under various  
2 online aliases.”

3           On page 1 of Document 78 Jason Goodman asserts, “ Plaintiff Steele and  
4 Intervenor Applicant Sweigert have been conspiring together and with intermediaries for more  
5 than one year and in an ongoing fashion to create and monetize a harassment campaign (The  
6 Campaign) intended to disrupt the Defendant’s business, personal life and worldwide reputation,  
7 and chill Defendant’s journalistic endeavors which have revealed **evidence of felony crimes by**  
8 **Plaintiff, Intervenor Applicant and third-party co-conspirators.** The Campaign has  
9 consisted of persistent manufacturing and dissemination of false claims, deliberate libel and  
10 slander, predicate acts...”

11           Jason Goodman makes numerous allegations and provides exhibits, yet **there is**  
12 **not one statement of fact, nor any evidence provided in Document 78 that implicates**  
13 **Jacquelyn Weaver in any of these conspiracy charges.**

14           I, Jacquelyn Weaver, am the author of an online blog at  
15 trackingmeroz.wordpress.com, called *Tracking the Leopard Meroz: A Christian Commentary on*  
16 *Judges 5:23.*

17           Since June 14, 2017, when the Port of Charleston was shut down for 8 hours due  
18 to a *dirty bomb* false report, I have been following this story, and writing about the persons  
19 associated with the origination of this event, as well as side “human interest” stories. I have  
20 written about Robert David Steele, Jason Goodman, Queen Tut aka Susan Lutzke, George Webb  
21 Sweigert, David George Sweigert, Manuel Chavez III and Steve Outtrim. In addition, I have  
22 mentioned Frank Bacon and Kevin Alan Marsden.

1 Since mid-2017, I have published 128 posts; 46 represent PACER court  
2 documents which have been filed in two federal civil lawsuits: *Robert David Steele vs. Jason*  
3 *Goodman, Queen Tut (Lutzke) and Patricia Negron and D. George Sweigert vs. Jason Goodman.*

4  
5 Other PACER court documents I publish are in regard to about one-third of my  
6 articles representing my research into the anti-government/sovereign citizen/Tax Protestor  
7 ideology. In conjunction with this topic, I am a moderator in a Facebook group founded by  
8 former IRS Appeals Officer, Robert Baty, which discusses criminal and civil cases connected  
9 with these anti-government groups. Another one- third of my articles are a mix of Alternative  
10 Media topics including the abuses of free speech and the freedom of the press.

11  
12 On page 10, line 17 of Document 78, Jason Goodman states, "Sweigert, Steele  
13 and their co-conspirators engage in a form of acting they call Live Action Role Playing (LARP).  
14 I DENY this allegation as I write my blog using my legal name, and I have another website that  
15 has photos of my home, family, trip to Scotland, crafts, etc. Until recently, Jason Goodman and  
16 his associates were asserting that David Sweigert is the author of my blog, and that I do not exist  
17 as a real person, as I demonstrate in EXHIBIT A.

18  
19 On January 10, 2019, I wrote an article called *Mindless Loitering Under A Gas*  
20 *Light: Jason Goodman and Michael Barden Attempt to Reverse Engineer Their Legal Problems.*  
21 This article was written in response to 3 videos published by Jason Goodman on *Crowdsourc*  
22 *the Truth* on January 9, 2019, which made insinuations about the relationship between the author  
23 of *Tracking the Leopard Meroz* and David Sweigert, the plaintiff of the RICO lawsuit against  
24 Jason Goodman. On page 4, I said, "Here is what I had written as an update on the Michael  
25 Barden article, which I am reposting because **Jason Goodman and Michael Barden are**  
26 **insinuating that an organized gang stalking campaign exists against them, based**  
27  
28



1 **apparently on the fact that *Tracking the Leopard Meroz* publishes public court records**  
2 **which involve them.” (See EXHIBIT A.)**

3           In this Exhibit A article, I document with screenshots a conversation which took  
4 place on Michael Barden’s Facebook page that shows that the Facebook Administrator for  
5 *Crowdsource the Truth*, Casey Whalin, had accused me of lying about my identity. Whalin  
6 claimed that my name is not really Jacquelyn Weaver, but Dave Sweigert. I have a copyright  
7 notice on my blog that identifies Jacquelyn Weaver as the author of *Tracking the Leopard*  
8 *Meroz*. During this Facebook discussion, Jason Goodman made the statement, “NO THREATS  
9 OR SUGGESTIONS OF THREATS SHOULD BE MADE ON SOCIAL MEDIA OR  
10 ELSEWHERE.”  
11

12  
13           On March 9, 2019, I posted on *Tracking the Leopard Meroz*, PACER documents  
14 representing *Robert David Steele vs. Jason Goodman: Document 78 - Defendant’s Opposition to*  
15 *the Motion to Intervene*.  
16

17           The day prior, on March 8, 2019, I had written an article titled, *The Ouroboros*  
18 *Effect: Jason Goodman of Crowdsource the Truth with David Hawkins of Reverse Engineered*  
19 *CSI Storyboards*. One of my regular readers left a comment on this article expressing a negative  
20 opinion of Jason Goodman’s *Crowdsource the Truth* YouTube channel.  
21

22           Jason Goodman countered my reader’s comment on March 9, 2019. (See  
23 EXHIBIT B). I have excerpted a portion of Jason Goodman’s comment, saying, “If you believe  
24 the biased propaganda presented on this blog, you might ask yourself why Weaver has refrained  
25 from editorializing her latest post regarding the docket entry 78. She has merely presented the  
26 court documents without her usual grossly slanted commentary, which is coincidentally  
27 continually lauding the very individuals behind the alleged conspiracy to create a harassment for  
28

1 pay operation. I would suggest, that may be due to the fact that any further comments she  
2 makes, may in fact, not be helpful to her in defending her actions should the court find my  
3 conclusions in this matter to be correct.”

4  
5 Jason Goodman does not know why I did not comment on Document 78, and so  
6 he offers his theory that Document 78 has intimidated me into silence (due to the inclusion of my  
7 name in a list of third-party co-conspirators).

8 In the past 20 months of writing articles that involve *Crowdsourcing the Truth*, not  
9 once has Jason Goodman written me to challenge the numerous screen shots, transcriptions of  
10 videos, references to court documents or any other documentation I provide to support my  
11 commentary....that is, not until the above referenced March 9, 2019 comment shown in Exhibit  
12 B which is in regard to Document 78 in the Robert David Steele lawsuit against Jason Goodman.

13 I DENY the allegations of Jason Goodman in Document 78 in their entirety.  
14 Jason Goodman has provided NO evidence of any wrongdoing on my part to support his false  
15 allegations.  
16  
17  
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20

21 Dated this day of March 13, 2019.

22  
23   
24 Jacquelyn Weaver

Jacquelyn Weaver  
102 Fern  
Purvis, MS 39475  
Jacquelyn113@hotmail.com

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ROBERT DAVID STEELE, ET. AL.,

Plaintiff,

vs.

JASON GOODMAN, ET. AL.

Defendant

Case No.: 3:17-CV-601-MHL

CERTIFICATE OF SERVICE

On this day, March 13, 2019, I have caused to be placed in the U. S. Postal  
Service true copies of the attached pleading (with First Class postage affixed) to the following  
parties.

**CLERK of COURT**

**U. S. District Court, E. D. VA,**

Federal Courthouse

701 East Broad Street

Richmond, VA 23219

**Steven S. Biss, Esq.**

300 West Main Street, Suite 102

Charlottesville, VA 22903

**Jason Goodman**

252 7<sup>th</sup> Avenue #6S

New York, NY 10001

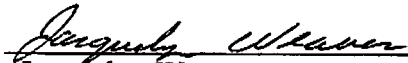
1           **Richard Johan Conrod, Jr.**

2           **Kaufman & Canoles PC**

3           150 W. Main Street

4           P. O. Box 3037

5           Norfolk, VA 23510

6  
7  
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9             
10          Jacquelyn Weaver      3-13-2019

1 List of Exhibits

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- 4
- 5 A. *Mindless Loitering Under a Gas Light: Jason Goodman and Michael Barden*
- 6 *Attempt to Reverse Engineer Their Legal Problems* published on
- 7 trackingmeroz.wordpress.com January 10, 2019 ( note pages 4 “Update
- 8 November 25, 2018”)
- 9
- 10 B. Jason Goodman March 9, 2019 comment on a reader’s comment on the March
- 11 8, 2019 trackingmeroz.wordpress.com article, *The Ouroboros Effect: Jason*
- 12 *Goodman of Crowdsourcethe Truth with David Hawkins of Reverse*
- 13 *Engineered CSI Storyboards*
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